



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

November 27, 2024

Via ECF

Honorable Jessica G. L. Clarke
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Intercept Media, Inc. v. U.S. Air Force, et al.*, 24 Civ. 601 (JGLC)

Dear Judge Clarke:

This Office represents the U.S. Air Force, U.S. Department of State, U.S. Treasury, and U.S. Navy (collectively, the “government”) in the above-referenced case brought by plaintiff Intercept Media, Inc. pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552.

On Monday, the parties filed a stipulation and proposed order of settlement and dismissal. *See* ECF No. 33. By its terms, the agreement would resolve this matter and permit the Court to dismiss the action, subject to a limited right to reinstatement embodied in paragraph 4.b.

Because the settlement is contingent on attorney’s fees being paid this calendar year and because the agencies cannot feasibly process payment until the stipulation is ordered by the Court, we respectfully request that the Court so-order the stipulation and proposed order at its earliest convenience.

The government thanks the Court for its consideration of this matter.

Respectfully submitted,

DAMIAN WILLIAMS
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Southern District of New York

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